

From: [Lorna A. Syme](#)
To: [Christopher J. Swartz](#)
Subject: FW: amendment - [Message and attachment(s) contain CUI]
Date: Wednesday, July 10, 2019 11:47:50 AM
Attachments: [Amendment to ethics agreement and nominee report 2019.docx](#)

Attachment referred to EPA

From: Fugh, Justina [mailto:Fugh.Justina@epa.gov]
Sent: Tuesday, April 23, 2019 5:32 PM
To: Lorna A. Syme
Subject: RE: amendment - [Message and attachment(s) contain CUI]

Hi Lorna,
Belated thanks for your help! Attached please find the proposed amendment for Peter Wright. He will really want to be able to explain what happen, so this version includes his explanation. We can remove that if necessary, and have it reflected in the transmittal letter instead.

Justina

Justina Fugh | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Lorna A. Syme <lasyme@oge.gov>
Sent: Monday, April 08, 2019 10:28 AM
To: Fugh, Justina <(b) (6)>
Subject: amendment - [Message and attachment(s) contain CUI]

CONTROLLED
Email and attachment(s) contain CUI.

No attachment found in search

Justina:

See attached for 278 amendment template. I believe the filer as already divested/donated of the asset but please let me know if I have misunderstood.

1. Once you've drafted the amendment, please email to me. OGE will review.
2. Once OGE's reviewed and worked with you on any necessary edits, the filer should sign it.
3. Then, please email it to me with another transmittal letter, which should be similar in substance to the original one you sent, i.e., the DAEO "continues" to believe the filer is in compliance with all applicable laws, etc.
4. OGE will sign the amendment and send it to the Senate.

Please remember: if in the future someone from the public requests a copy of the certified 278, you will need to release both the 278 as well as this amendment.

Lorna

Lorna Syme
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
Telephone: (202) 482-9277
Facsimile: (202) 482-9237

Visit OGE's website: >>www.oge.gov<<

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From: [Lorna A. Syme](#)
To: [Christopher J. Swartz](#)
Subject: FW: amendment - [Message and attachment(s) contain CUI] - [Message contains CUI] - [Message and attachment(s) contain CUI]
Date: Wednesday, July 10, 2019 11:48:20 AM
Attachments: [Amendment notification to OGE 2019.docx](#)
[Amendment to ethics agreement and nominee report 2019.docx](#)

First attachment "Amendment notification to OGE 2019.docx" referred to EPA. Second attachment "Amendment to ethics agreement and nominee report 2019.docx" is the same attachment as the attachment indicated on page 6 for email sent on July 10, 2019 at 11:47 am from Lorna Syme

From: Fugh, Justina [<mailto:Fugh.Justina@epa.gov>]
Sent: Friday, April 26, 2019 11:49 AM
To: Lorna A. Syme
Subject: RE: amendment - [Message and attachment(s) contain CUI] - [Message contains CUI] - [Message and attachment(s) contain CUI]

Hi Lorna,
Thanks! See the attached draft transmittal letter to OGE and draft letter from Mr. Wright.
We'll be happy to incorporate any changes you all recommend!
Happy Friday,
Justina

Justina Fugh | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Lorna A. Syme <lasyme@oge.gov>
Sent: Friday, April 26, 2019 9:12 AM
To: Fugh, Justina (b) (6) >
Subject: RE: amendment - [Message and attachment(s) contain CUI] - [Message contains CUI] - [Message and attachment(s) contain CUI]

CONTROLLED
Email and attachment(s) contain CUI.

No attachment found in search

Attached is a sample letter. Take a look, revise and send me back the draft. I will then send both letters up for review.

Thanks,

Lorna

From: Fugh, Justina [<mailto:Fugh.Justina@epa.gov>]

Sent: Thursday, April 25, 2019 2:22 PM

To: Lorna A. Syme

Subject: RE: amendment - [Message and attachment(s) contain CUI] - [Message contains CUI]

Hi Lorna,

Yes, please send me a template transmittal letter.

Much obliged,

Justina

Justina Fugh | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A |
Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for
ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772

From: Lorna A. Syme <lasyme@oge.gov>

Sent: Thursday, April 25, 2019 12:24 PM

To: Fugh, Justina <(b) (6)>

Subject: RE: amendment - [Message and attachment(s) contain CUI] - [Message contains CUI]

CONTROLLED

Justina:

Would you please send the transmittal letter when you have a chance. We are actually going to look at both letters together. If you want a draft template I am happy to send you one.

Lorna

Remainder of thread released or referred above





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

OFFICE OF
GENERAL COUNSEL

The Honorable Emory A. Rounds, III
Director
U.S. Office of Government Ethics
1201 New York Avenue, NW
Suite 500
Washington DC, 20005

Dear Mr. Rounds:

The purpose of this letter is to forward the enclosed supplement to Mr. Peter Wright's Public Financial Disclosure Report (278e). Mr. Wright explains in his letter dated April XX, 2019, the reasons for the supplement.

As the Alternate Designed Agency Ethics Official of the Environmental Protection Agency, I have reviewed the information contained in the supplement. I continue to believe that there are no unresolved conflicts between his financial interests and the duties he will perform if confirmed as the Assistant Administrator for the Office of Land and Emergency Management of the United States Environmental Protection Agency.

Sincerely yours,

Justina Fugh
Director, Ethics Office

enclosure

From: [Lorna A. Syme](#)
To: [Christopher J. Swartz](#)
Subject: FW: amendment - [Message contains CUI]
Date: Wednesday, July 10, 2019 11:48:28 AM

From: Fugh, Justina [mailto:Fugh.Justina@epa.gov]
Sent: Thursday, May 16, 2019 5:17 PM
To: Lorna A. Syme
Subject: RE: amendment - [Message contains CUI]

Oh, right, I lost track of where we were on that. Will get back to you soon.

From: Lorna A. Syme [mailto:lasyme@oge.gov]
Sent: Thursday, May 16, 2019 11:55 AM
To: Fugh, Justina <(b) (6)>
Subject: amendment - [Message contains CUI]

CONTROLLED

Hi Justina:

Just following up on the amendment for Mr. Wright. In our last discussion you had indicated that you would send me an analysis that Mr. Wright had not worked on any matters affecting Dow while he still retained the Dow stock.

Thanks,

Lorna

Lorna Syme
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
Telephone: (202) 482-9277
Facsimile: (202) 482-9237

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From: [Lorna A. Syme](#)
To: [Christopher J. Swartz](#)
Subject: FW: following up
Date: Wednesday, July 10, 2019 11:49:31 AM

From: Fugh, Justina [mailto:Fugh.Justina@epa.gov]
Sent: Monday, July 01, 2019 4:15 PM
To: Lorna A. Syme
Subject: FW: following up

I just re-read my note, and realized that I said that Mr. Wright “sold” the stock. Actually, he did donate it to his alma mater..

From: Fugh, Justina
Sent: Monday, July 01, 2019 12:32 AM
To: 'Lorna A. Syme' <lasyme@epa.gov>
Subject: following up

Hi Lorna,
I had occasion to think about Peter Wright lately (more later) and realized that I never closed the loop with you on this.

Back in April or May 2019, I conferred with the senior career official in the Office of Land and Emergency Response to determine whether Peter Wright participated personally and substantially on any particular matter of general applicability during the time that he mistakenly still owned DowDuPont stock. You’ll recall that he had thought that he had donated the stock in CY 2018, but when he started to do his taxes in early 2019, he learned to his horror that the transfer to his alma mater had not actually taken place. He notified me right way and then sold the stock.

The career official, who has also served for many years as a Deputy Ethics Official and understands the importance of the situation and the intricacies, (b) (5)

[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

[illegible]

From: Lorna A. Syme [<mailto:lasyme@oge.gov>]

Sent: Wednesday, June 05, 2019 5:20 PM

To: Fugh, Justina <(b) (6)>

Subject: Fw: RE: amendment - [Message contains CUI] - [Message and any attachment(s) contain CUI]

CONTROLLED

Email and any attachment(s) contain CUI.

Hi Justina:

Just checking in again on the analysis for Mr. Wright.

Thanks!

Lorna

Remainder of thread released or referred above



From: [Lorna A. Syme](#)
To: [Deborah J. Bortot](#)
Subject: RE: Follow-up info - Peter Wright nomination
Date: Monday, July 22, 2019 11:48:59 AM

I don't think so but I'll confirm.

From: Deborah J. Bortot
Sent: Monday, July 22, 2019 11:48 AM
To: Lorna A. Syme <lasyme@oge.gov>
Subject: RE: Follow-up info - Peter Wright nomination

(b) (5)

From: Lorna A. Syme
Sent: Monday, July 22, 2019 11:17 AM
To: Deborah J. Bortot <djbortot@oge.gov>
Subject: RE: Follow-up info - Peter Wright nomination

(b)(5), (b)(6)

Do you agree?

Lorna

From: Deborah J. Bortot
Sent: Monday, July 22, 2019 11:12 AM
To: Lorna A. Syme <lasyme@oge.gov>
Subject: RE: Follow-up info - Peter Wright nomination

Does there need to be a (b) (5) as well?

From: Lorna A. Syme
Sent: Monday, July 22, 2019 10:51 AM
To: Deborah J. Bortot <djbortot@oge.gov>
Subject: FW: Follow-up info - Peter Wright nomination

Per my voicemail, you are good with these once they change the (b) (5)

Lorna

From: Seth Jaffe
Sent: Thursday, July 11, 2019 9:39 AM

Attachment referred to EPA

Thanks,
Seth

(b) (5) [Redacted]
[Redacted]
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(b) (5)

[REDACTED]

Category	Value
Category 1	Value 1
Category 2	Value 2
Category 3	Value 3
Category 4	Value 4
Category 5	Value 5
Category 6	Value 6
Category 7	Value 7
Category 8	Value 8
Category 9	Value 9
Category 10	Value 10
Category 11	Value 11
Category 12	Value 12
Category 13	Value 13
Category 14	Value 14
Category 15	Value 15
Category 16	Value 16
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Category 92	Value 92
Category 93	Value 93
Category 94	Value 94
Category 95	Value 95
Category 96	Value 96
Category 97	Value 97
Category 98	Value 98
Category 99	Value 99
Category 100	Value 100

(b) (5) [REDACTED]

I hope that you will consider this additional information. Please contact me at (816) 835-1909 or Justina Fugh at (202) 564-1786 if you have any further questions.

Thank you,

Dave Cozad
Acting Designated Agency Ethics Official

Dave Cozad
Regional Counsel
Region 7

913-551-7587
cozad.david@epa.gov



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

JUL - 9 2019

OFFICE OF
GENERAL COUNSEL

The Honorable Emory A. Rounds, III
Director
U.S. Office of Government Ethics
1201 New York Avenue, NW
Suite 500
Washington DC, 20005

Dear Mr. Rounds:

The purpose of this letter is to forward the enclosed supplement to Mr. Peter Wright's Public Financial Disclosure Report (278e). Mr. Wright explains in his letter dated July 9, 2019, the reasons for the supplement.

As the Alternate Designed Agency Ethics Official of the Environmental Protection Agency, I have reviewed the information contained in the supplement. I continue to believe that there are no unresolved conflicts between his financial interests and the duties he will perform if confirmed as the Assistant Administrator for the Office of Land and Emergency Management of the United States Environmental Protection Agency.

Sincerely yours,

A handwritten signature in blue ink, which appears to read "Justina Fugh", is positioned above the printed name.

Justina Fugh
Alternate Agency Ethics Official

enclosure



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

JUL - 9 2019

Ms. Justina Fugh
Alternate Agency Ethics Official
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Re: Addendum to Financial Disclosure Report of Peter C. Wright

Dear Ms. Fugh:

The purpose of this document is to supplement my financial disclosure report by reporting my interest in DowDuPont stock that was inadvertently omitted from the financial disclosure report that I signed on January 29, 2019. I believed that I had previously donated this stock in 2018, but then belatedly realized that I had not. Upon learning of the error, I notified you immediately, and donated the stock on March 12, 2019. I no longer hold any stock in DowDuPont.

Part 6

Description	EIF	Value	Income Type	Income Amount
Dow DuPont	N/A	\$50,001- \$100,000	Dividends	\$1,001-\$2,500

I understand that this supplement will be attached to my financial disclosure report and released upon request with that report.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter C. Wright".

Peter C. Wright

From: [Fugh, Justina](#)
To: [Deborah J. Bortot](#)
Cc: [Lorna A. Syme](#); [Mosley, Ferne](#)
Subject: Peter Wright
Date: Tuesday, July 23, 2019 5:48:07 PM
Attachments: [cover letter to OGE July 2019.pdf](#)
[image2019-07-22-172647.pdf](#)

Hi there,

Attached please find the cover letter formally transmitting Peter Wright's amendment to his previously filed nominee disclosure report.

Thanks for your attention to this matter, as always!

Cheers,

Justina

Justina Fugh | Director, Ethics Office | Office of General Counsel | US EPA | Mail Code 2311A | Room 4308 North, William Jefferson Clinton Federal Building | Washington, DC 20460 (for ground deliveries, use 20004 for the zip code) | phone 202-564-1786 | fax 202-564-1772



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Washington, D.C. 20460

JUL 23 2019

OFFICE OF
GENERAL COUNSEL

The Honorable Emory A. Rounds, III
Director
U.S. Office of Government Ethics
1201 New York Avenue, NW
Suite 500
Washington DC, 20005

Dear Mr. Rounds:

The purpose of this letter is to forward the enclosed supplement to Mr. Peter Wright's Public Financial Disclosure Report (278e). Mr. Wright explains in his letter dated July 22, 2019, the reasons for the supplement.

As the Alternate Designed Agency Ethics Official of the Environmental Protection Agency, I have reviewed the information contained in the supplement. I continue to believe that there are no unresolved conflicts between his financial interests and the duties he will perform if confirmed as the Assistant Administrator for the Office of Land and Emergency Management of the United States Environmental Protection Agency.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Justina Fugh".

Justina Fugh
Alternate Agency Ethics Official

enclosure



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

Ms. Justina Fugh
Alternate Agency Ethics Official
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Re: Addendum to Financial Disclosure Report of Peter C. Wright

Dear Ms. Fugh:

The purpose of this document is to supplement my financial disclosure report by reporting my interest in DowDuPont stock that was inadvertently omitted from the financial disclosure report that I signed on January 29, 2019. I believed that I had previously donated this stock in 2018, but then belatedly realized that I had not. Upon learning of the error, I notified you immediately, and donated the stock on March 12, 2019. I no longer hold any stock in DowDuPont.

Part 2

Description	EIF	Value	Income Type	Income Amount
DowDuPont	N/A	\$50,001-\$100,000	Dividends	\$1,001-\$2,500

I understand that this supplement will be attached to my financial disclosure report and released upon request with that report.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter C. Wright", is written over a horizontal line.

Peter C. Wright



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

MAR - 8 2018

OFFICE OF
GENERAL COUNSEL

Mr. David J. Apol, Acting Director
U.S. Office of Government Ethics
Suite 500
1201 New York Avenue, NW
Washington, D.C. 20005-3919

Dear Mr. Apol:

As required by 5 C.F.R. § 2634.605(c), I have reviewed the Public Financial Disclosure Report (OGE 278) submitted by Peter Wright to describe the steps that he will take to avoid any actual or apparent conflict of interest in the event that he is confirmed for the position of Assistant Administrator for the Office of Land and Emergency Management of the United States Environmental Protection Agency.

As required by 18 U.S.C. § 208(a), he will not participate personally and substantially in any particular matter in which he knows that he has a financial interest directly and predictably affected by the matter, or in which he knows that a person whose interests are imputed to him has a financial interest directly and predictably affected by the matter, unless he first obtains a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualifies for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). He understands that the interests of the following persons are imputed to him: any spouse or minor child of his; any general partner of a partnership in which he is a limited or general partner; any organization in which he serves as officer, director, trustee, general partner or employee; and any person or organization with which he is negotiating or has an arrangement concerning prospective employment.

Upon confirmation, he will resign from his position with The Dow Chemical Company, a wholly owned subsidiary of DowDuPont, Inc. For a period of one year after his resignation from this entity, he will not participate personally and substantially in any particular matter involving specific parties in which he knows that this entity is a party or represents a party, unless he is first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Within 90 days following his resignation, he will receive a severance payment and bonus for calendar year 2017, as is the corporation's practice. He will not participate personally and substantially in any particular matter that to his knowledge has a direct and predictable effect on the ability or willingness of The Dow Chemical Company or DowDuPont, Inc. to provide these payments, unless he first obtains a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

He will forfeit all DowDuPont, Inc. stock options that are unvested at the time of his resignation and, following his appointment, will divest all of his stock in DowDuPont, Inc., to include any stock resulting from settlement of any deferred and performance shares. He understands that he may be eligible to request a Certificate of Divestiture for qualifying assets and that a Certificate of Divestiture is effective only if obtained prior to divestiture. Regardless of whether he receives a Certificate of Divestiture, he will ensure that all divestitures discussed in this agreement occur within the agreed upon timeframes and that all proceeds are invested in non-conflicting assets. Until he has divested all of these financial interests, he will not participate personally and substantially in any particular matter that to his knowledge has a direct and predictable effect on the financial interests of The Dow Chemical Company or DowDuPont, Inc. or its subsidiaries unless he first obtains a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualifies for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

He will continue to participate in The Dow Chemical Company defined benefit pension plan, but will not participate personally and substantially in any particular matter that to his knowledge has a direct and predictable effect on the ability or willingness of The Dow Chemical Company or DowDuPont, Inc. to provide this contractual benefit, unless he first obtains a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualifies for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). In addition, he will not participate personally and substantially in any particular matter involving specific parties in which he knows The Dow Chemical Company or DowDuPont, Inc. or any of its subsidiaries is a party or represents a party, unless he is first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Upon confirmation, he will resign from his positions with the National Association of Wabash Men and the Lambda Chi Alpha Home Association of Wabash College. For a period of one year after his resignation from each of these entities, he will not participate personally and substantially in any particular matter involving specific parties in which he knows that entity is a party or represents a party, unless he is first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

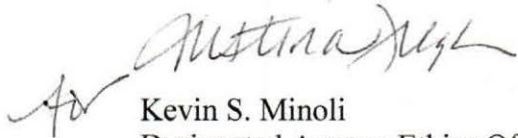
If he has a managed account or otherwise uses the services of an investment professional during his appointment, he will ensure that the account manager or investment professional obtains his prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the exemption at 5 C.F.R. § 2640.201(a), obligations of the United States, or municipal bonds.

He will meet in person with me during the first week of his service as Assistant Administrator in order to complete the initial ethics briefing required under 5 C.F.R. § 2638.305. Within 90 days of his confirmation, he will document his compliance with this ethics agreement by notifying me in writing when he has completed the steps described in this ethics agreement.

He understands that as an appointee he will be required to sign the Ethics Pledge (Exec. Order No. 13770) and that he will be bound by the requirements and restrictions therein in addition to the commitments he has made in this ethics agreement.

He has been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Kevin S. Minoli", with a stylized flourish at the end.

Kevin S. Minoli
Designated Agency Ethics Official and
Principal Deputy General Counsel

MAR - 7 2018

Mr. Kevin S. Minoli
Designated Agency Ethics Official
U.S. EPA (2310A)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Mr. Minoli:

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Assistant Administrator for the Office of Land and Emergency Management of the United States Environmental Protection Agency.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

Upon confirmation, I will resign from my position with The Dow Chemical Company, a wholly owned subsidiary of DowDuPont, Inc. Within 90 days following my resignation, I will receive a severance payment from DowDuPont, Inc. The amount of the severance payment will be fixed as of the date of my termination with the company and the payment will be determined by an objective method in accordance with the company's standard policy for such payments. Following my resignation, I will receive a bonus for calendar year 2017, as is the corporation's practice. The Dow Chemical Company will use an objective formula to calculate this bonus. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the ability or willingness of The Dow Chemical Company or DowDuPont, Inc. to provide these payments, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

I own shares of DowDuPont, Inc. and I hold vested deferred shares and vested performance shares in DowDuPont, Inc. I do not hold stock options, restricted stock, or restricted stock units. Pursuant to company policy, DowDuPont, Inc. will accelerate the issue date of DowDuPont stock in connection with my deferred and performance shares and will release the stock to me within 30 days of my separation. Within 90 days of my confirmation, I will divest all of my stock in DowDuPont, Inc., to include any stock resulting from settlement of my deferred and performance shares. Until I have divested all of these financial interests, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and

predictable effect on the financial interests of The Dow Chemical Company or DowDuPont, Inc. or its subsidiaries unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

I understand that I may be eligible to request a Certificate of Divestiture for qualifying assets and that a Certificate of Divestiture is effective only if obtained prior to divestiture. Regardless of whether I receive a Certificate of Divestiture, I will ensure that all divestitures discussed in this agreement occur within the agreed upon timeframes and that all proceeds are invested in non-conflicting assets.

I will continue to participate in The Dow Chemical Company defined benefit pension plan, but will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the ability or willingness of The Dow Chemical Company or DowDuPont, Inc. to provide this contractual benefit, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). In addition, I will not participate personally and substantially in any particular matter involving specific parties in which I know The Dow Chemical Company or DowDuPont, Inc. or any of its subsidiaries is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Upon confirmation, I will resign from my positions with the National Association of Wabash Men and the Lambda Chi Alpha Home Association of Wabash College. For a period of one year after my resignation from each of these entities, I will not participate personally and substantially in any particular matter involving specific parties in which I know that entity is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

If I have a managed account or otherwise use the services of an investment professional during my appointment, I will ensure that the account manager or investment professional obtains my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the exemption at 5 C.F.R. § 2640.201(a), obligations of the United States, or municipal bonds.

I will meet in person with you during the first week of my service in the position of Assistant Administrator in order to complete the initial ethics briefing required under 5 C.F.R. § 2638.305. Within 90 days of my confirmation, I will document my compliance with this ethics agreement by notifying you in writing when I have completed the steps described in this ethics agreement.

I understand that as an appointee I will be required to sign the Ethics Pledge (Exec. Order No. 13770) and that I will be bound by the requirements and restrictions therein in addition to the commitments I have made in this ethics agreement.

I have been advised that this ethics agreement will be posted publicly, consistent with 5

U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely yours,

A handwritten signature in black ink, appearing to be "Peter C. Wright", written over a horizontal line.

Peter C. Wright